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PGH-94-MJD-1301

December 16, 1994

Mr. Dion Novak
U.S. Environmental Protection Agency
Region V
77 West Jackson Boulevard
HSRL-6J
Chicago, Illinois 60604

Subject: Enviro-Chem Superfund Site
Monthly Progress Report Number 16
November 15, 1994 through December 14, 1994

Dear Mr. Novak:

Enclosed is the subject progress report. A copy of the report has been submitted to Mr. Tony Likins at IDEM.

Sincerely,



Mark J. Dowiak
Project Manager

MJD/rks

Enclosure

cc: Mr. Roy O. Ball - ERM North Central
Mr. Norman Bernstein - Bernstein & Associates
Mr. John M. Kyle, III - Barnes & Thornburg



Memorandum

PGH-94-MJD-1300

TO: Tony Likins, IDEM
Dion Novak, U.S. EPA

DATE: December 16, 1994

FROM: Mark J. Dowiak, P.E., Project Manager *M. Dowiak*

COPIES: Roy. O. Ball, Ph.D. - ERM-North Central
Norman Bernstein, Esq. - Bernstein & Associates
John M. Kyle, Esq. - Barnes & Thornburg

SUBJECT: Enviro-Chem Superfund Site
Monthly Progress Report Number 16
November 15, 1994 through December 14, 1994

This Monthly Progress Report has been prepared in accordance with Section XII of the Consent Decree entered September 10, 1991, Number 83-1419 C, U.S.D.C. District of Indiana.

Activities

On November 15, 1994 U.S. EPA provided the Trustees with written comments on the Draft Project Schedule - Revised Response Action (RRA), which was submitted to U.S. EPA October 13, 1994. The project schedule was further discussed during the November 23, 1994 meeting with U.S. EPA, and it was jointly decided by U.S. EPA and the Trustees that the schedule will be revised and resubmitted to U.S. EPA after approval of the Preliminary Design (30 percent) for the RRA.

AWD Technologies, Inc. (AWD) performed subsurface investigations of the site southern concrete pad area on November 16 through 18, 1994. The objective of the investigation was to obtain additional data on the soil and groundwater conditions beneath the pad with respect to excavation of the subsoils to a depth of 9 feet. Three wellpoints, OW-3, OW-4 and OW-5, were placed in the sand water-bearing zone beneath the pad. Undisturbed soil samples were also taken for soil geotechnical testing. Preliminary data was submitted to U.S. EPA on November 21. Shallow sand deposits were found east of the pad (OW-5), at a depth of 8 feet BGS. These deposits may extend beneath the eastern portion of the concrete pad and be hydraulically connected to the sand water-bearing zone. The implication of these shallow sands is that excavation to 9 feet BGS would require either dewatering of the sand or placement of a temporary cutoff wall to reduce the potentiometric head in the sand, and allow excavation to occur. Another implication is that the Consent Decree remedy, if implemented in the eastern area of the concrete pad, would probably require significantly greater dewatering efforts and

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increased costs to implement the Remedial Action. The feasibility of SVE in this area is highly uncertain based on the recent investigation findings. The Concrete Pad Area Subsurface Investigation Report is expected to be submitted to U.S. EPA by mid January, 1995.

A project meeting was held on November 23, 1994 at the U.S. EPA Region V offices. The purpose of the meeting was to discuss U.S. EPA comments on the RRA Preliminary Design Report, July, 1994, and the Evaluation of Alternatives Memorandum, July, 1994. The preliminary results of the concrete pad area investigations and its impact on the RRA design were also discussed. A summary of the results of the meeting is as follows:

1. The RRA will be modified to include sheet piling in the eastern portion of the area of excavation, as necessary, to allow soil excavation to a depth of 9 feet across the entire area of excavation.
2. The excavation will be dug below 9 feet if visibly contaminated soil is present based on field assessments performed jointly by U.S. EPA, IDEM and the Trustees.
3. The Trustees will not conduct any exit sampling of the excavation areas but will cooperate with U.S. EPA if it wishes to conduct sampling. If U.S. EPA wishes to conduct exit sampling, U.S. EPA and the Trustees will cooperate so that it can be done expeditiously to avoid delay in closing the excavation.
4. Any excavation exit sampling will be split. The results will be used to determine the extent of residual inorganic and semi-volatile constituents, which will in turn determine if a cap over the clean fill area is needed. Criteria for the cap determination was proposed by U.S. EPA to the Trustees and by the Trustees to U.S. EPA on December 9, 1994.
5. The design of the cap on the northern area of the site (where a cap will be required in any event), and the timing of the installation of the cap, will be in accordance with the RRA proposal. The revised RRA will provide the justification for the change in the cap design and the change in the timing of the cap.
6. The frequency of SVE monitoring will be reduced from quarterly to semi-annually in accordance with the RRA proposal, although sampling will be shifted to quarterly before system shutdown. The revised RRA will provide the justification for the change in monitoring frequency.

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7. Schedule milestones agreed to in the meeting include submittal of the revised Evaluation of RRA Alternatives on December 16, 1994 and the revised RRA Preliminary Design on January 31, 1995.

The site inspection was conducted by DeMaximus Inc. (formerly QEM) on November 29, 1994. The following conditions were noted:

- Rainwater is standing on the decontamination and wastewater storage pads, the site area southwest of the former facility process building, and the southern concrete pad.
- The northwest corner fence post was not yet repaired, but was expected to be repaired in early December.
- Hay bales were installed by DeMaximus in the north drainage ditch.
- All other maintenance work reported in the Monthly Progress Report Number 15 was completed.

The Drum Removal Plan was submitted to U.S. EPA on November 29, 1994.

Activities to be conducted from December 15, 1994 through January 14, 1995.

A site inspection will be conducted by DeMaximus.

The revised Evaluation of RRA Alternatives Memorandum will be submitted to U.S. EPA on December 16, 1994.

The Concrete Pad Area Subsurface Investigation Report will be submitted to U.S. EPA by mid January, 1995.

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